

# **EXHIBIT D**

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**From:** Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>  
**Sent:** Friday, August 8, 2025 11:02 AM  
**To:** Belknap, Thomas; O'Laughlin, Andy  
**Cc:** David Reisman; Hobgood, John; R. Keith Jarrett; Lawrence F. Walker; Bennett III, William R.  
**Subject:** RE: [External Email] Dali - Deposition of HHI

Tom, thanks. HHI does not believe that the Vessel Interests' two subpoenas are proper and will respond to them on the August 22 date that we've agreed upon by moving to quash and serving written objections. HHI preserves and does not waive all its defenses and objections to the subpoenas including for improper service and lack of personal jurisdiction. We do not agree to your proposal of combining the Vessel Interest subpoenas with Maryland's pending request for written questions. The two sets of requests are different in scope and burden and the Vessel Interests are differently situated from Maryland given they have attempted to sue HHI in the E.D. of Pennsylvania. Should the Vessel Interests attempt to pursue their subpoenas via the Hague process, HHI reserves all its rights, and will require full compliance with that process.

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**From:** Belknap, Thomas <Thomas.belknap@BlankRome.com>  
**Sent:** Friday, August 8, 2025 9:55 AM  
**To:** O'Laughlin, Andy <Andy.OLaughlin@wilmerhale.com>  
**Cc:** David Reisman <DReisman@liskow.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Hobgood, John <John.Hobgood@wilmerhale.com>; R. Keith Jarrett <rkjarrett@liskow.com>; Lawrence F. Walker <lwalker@cozen.com>; Bennett III, William R. <william.bennett@blankrome.com>  
**Subject:** RE: [External Email] Dali - Deposition of HHI

---

**EXTERNAL SENDER**

Hi Andy-

Just following up on the below. We really need to hear HHI's position asap given our deadline Monday to file a response to the application for Letter of Request.

Tks-

Tom

**Thomas H. Belknap Jr.** | BLANKROME

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---

**From:** O'Laughlin, Andy <[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)>

**Sent:** Wednesday, August 6, 2025 4:25 PM

**To:** Belknap, Thomas <[Thomas.belknap@BlankRome.com](mailto:Thomas.belknap@BlankRome.com)>

**Cc:** David Reisman <[DReisman@liskow.com](mailto:DReisman@liskow.com)>; Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Hobgood, John <[John.Hobgood@wilmerhale.com](mailto:John.Hobgood@wilmerhale.com)>; R. Keith Jarrett <[rkjarrett@liskow.com](mailto:rkjarrett@liskow.com)>; Lawrence F. Walker <[lwalker@cozen.com](mailto:lwalker@cozen.com)>; Bennett III, William R. <[william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)>

**Subject:** RE: [External Email] Dali - Deposition of HHI

Thank you Tom, we'll be in touch.

Andy O'Laughlin

**WilmerHale** | 617.526.6220

---

**From:** Belknap, Thomas <[Thomas.belknap@BlankRome.com](mailto:Thomas.belknap@BlankRome.com)>

**Sent:** Wednesday, August 6, 2025 12:05 PM

**To:** O'Laughlin, Andy <[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)>

**Cc:** David Reisman <[DReisman@liskow.com](mailto:DReisman@liskow.com)>; Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Hobgood, John <[John.Hobgood@wilmerhale.com](mailto:John.Hobgood@wilmerhale.com)>; R. Keith Jarrett <[rkjarrett@liskow.com](mailto:rkjarrett@liskow.com)>; Lawrence F. Walker <[lwalker@cozen.com](mailto:lwalker@cozen.com)>; Bennett III, William R. <[william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)>

**Subject:** Re: [External Email] Dali - Deposition of HHI

**EXTERNAL SENDER**

Hi Andy - yes, we can agree to this.

Look forward to hearing from you on the other point.

Rgds-

Tom

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Tom Belknap

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On Aug 5, 2025, at 10:09 PM, O'Laughlin, Andy <[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)> wrote:

Thomas,

We saw your joint request for additional time to respond to the letter of request and to take discovery beyond the fact cut off. We are still working with our client regarding HHI's position on your proposal. As we mentioned, most of South Korea is on vacation during the first two weeks of August. We expect to be in a position to get back to you by Friday in time for you to make your filing on the proposed August 11 date. In the meantime, would you be willing to agree to a one-week extension of the return date on the deposition subpoena, and to agree that our response to the document subpoena can be due on the same schedule so they are both due on August 22?

Andy O'Laughlin  
**WilmerHale** | 617.526.6220

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**From:** Belknap, Thomas <[Thomas.belknap@BlankRome.com](mailto:Thomas.belknap@BlankRome.com)>  
**Sent:** Sunday, August 3, 2025 6:17 PM  
**To:** David Reisman <[DReisman@liskow.com](mailto:DReisman@liskow.com)>  
**Cc:** Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Hobgood, John <[John.Hobgood@wilmerhale.com](mailto:John.Hobgood@wilmerhale.com)>; R. Keith Jarrett <[rkjarrett@liskow.com](mailto:rkjarrett@liskow.com)>; Lawrence F. Walker <[lwalker@cozen.com](mailto:lwalker@cozen.com)>; Bennett III, William R. <[william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)>; O'Laughlin, Andy <[Andy.OLaughlin@wilmerhale.com](mailto:Andy.OLaughlin@wilmerhale.com)>  
**Subject:** Re: [External Email] Dali - Deposition of HHI

**EXTERNAL SENDER**

Ok for me too - I will circulate an invite in the morning.

---

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On Aug 3, 2025, at 6:06 PM, David Reisman <[DReisman@liskow.com](mailto:DReisman@liskow.com)> wrote:

Thanks Alan. 4 Eastern is good for us.

**David L. Reisman**  
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**Liskow**

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On Aug 3, 2025, at 4:25 PM, Schoenfeld, Alan E  
<[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)> wrote:

**[EXTERNAL EMAIL]**

Thanks. My only window tomorrow is 4-5, if that works for you all.

**Alan E. Schoenfeld | WilmerHale**

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---

**From:** Belknap, Thomas <[Thomas.belknap@BlankRome.com](mailto:Thomas.belknap@BlankRome.com)>  
**Sent:** Sunday, August 3, 2025 4:18 PM  
**To:** David Reisman <[DReisman@liskow.com](mailto:DReisman@liskow.com)>  
**Cc:** Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Hobgood, John <[John.Hobgood@wilmerhale.com](mailto:John.Hobgood@wilmerhale.com)>; R. Keith Jarrett <[rkjarrett@liskow.com](mailto:rkjarrett@liskow.com)>; Lawrence F. Walker <[lawalker@cozen.com](mailto:lawalker@cozen.com)>; Bennett III, William R. <[william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)>  
**Subject:** Re: [External Email] Dali - Deposition of HHI

**EXTERNAL SENDER**

Thanks- ok for me. Alan?

Tom

---

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On Aug 3, 2025, at 2:51 PM, David Reisman  
<[DReisman@liskow.com](mailto:DReisman@liskow.com)> wrote:

Tom

Can we push it to 2 Eastern/1 Central?

**David L. Reisman**  
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On Aug 3, 2025, at 12:06 PM,  
Belknap, Thomas  
<[Thomas.belknap@blankrome.com](mailto:Thomas.belknap@blankrome.com)> wrote:

[EXTERNAL EMAIL]

Thanks David – propose 1 pm  
Eastern if that is ok for everyone?

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**From:** David Reisman  
<[DReisman@liskow.com](mailto:DReisman@liskow.com)>  
**Sent:** Friday, August 1, 2025 6:23 PM  
**To:** Belknap, Thomas  
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Schoenfeld, Alan E  
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**Cc:** Hobgood, John  
<[John.Hobgood@wilmerhale.com](mailto:John.Hobgood@wilmerhale.com)>; R.  
Keith Jarrett <[rkjarrett@liskow.com](mailto:rkjarrett@liskow.com)>;  
Walker, Lawrence F.  
<[lawalker@cozen.com](mailto:lawalker@cozen.com)>; Bennett III,  
William R.  
<[william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)>  
**Subject:** RE: Dali - Deposition of HHI

Thanks Tom. We are available to  
discuss Monday afternoon.

**David L. Reisman**  
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<[image002.png](#)>

<[image003.png](#)>

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<[image004.png](#)>

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**From:** Belknap, Thomas  
<[Thomas.belknap@BlankRome.com](mailto:Thomas.belknap@BlankRome.com)>  
**Sent:** Friday, August 1, 2025 2:01 PM  
**To:** Schoenfeld, Alan E  
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David Reisman  
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**Cc:** Hobgood, John  
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William R.

[<william.bennett@blankrome.com>](mailto:william.bennett@blankrome.com)

**Subject:** [External Email] Dali -  
Deposition of HHI

[EXTERNAL EMAIL]

Dear Alan and David-

First, attached is a courtesy copy of the complaint filed yesterday and served today against HHI in the Eastern District Court in Pennsylvania.

Second, we refer to our recent correspondence with Alan concerning Petitioners' subpoenas and also Claimants' notice of deposition by written questions received on July 29 and their motion for Letters Rogatory filed yesterday. For the sake of good order, note that we object to any deposition of any HHI witness proceeding by written questions. FRCP Rule 31 is not an appropriate mechanism for taking testimony of a witness on substantive issues which are in controversy in a matter.

Based on our discussions with Alan, we understand HHI may be amenable to making a witness available for a live deposition in South Korea. We understand counsel for HHI have scheduling conflicts that would require this to proceed during early/mid-September. In view of this, we would like to discuss possible logistics for scheduling this deposition.

Are you all available for a call on Monday to discuss this issue?



Thanks and regards-

Tom

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